



Where ideas connect

Department of Environmental Quality
Division of Air Quality

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DAQE-IN0026007-03

October 10, 2003

Janet B. Bass
Autoliv ASP Inc. OEA Initiator Facility
1360 N 1000 W
Tremonton, Utah 84337

Dear Ms. Bass:

Re: Intent to Approve: Modification to Approval Order DAQE- 845-01, Equipment Changes
Box Elder County, CDS B; ATTAINMENT
Project Code: IN0026-007

The attached document is the Intent to Approve (ITA) for the above-referenced project. ITAs are subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any technical questions you may have on this project to Mr. Nando Meli. He may be reached at (801) 536-4052.

Sincerely,

Rusty Ruby, Manager
New Source Review Section

RR:NM:dn

cc: Bear River Health Department

STATE OF UTAH

Department of Environmental Quality

Division of Air Quality

INTENT TO APPROVE: MODIFICATION TO APPROVAL ORDER DAQE-845-01, EQUIPMENT CHANGES

**Prepared By: Nando Meli, Engineer
(801) 536-4052
Email: nmeli@utah.gov**

INTENT TO APPROVE NUMBER

DAQE-IN0026007-03

Date: October 10, 2003

Autoliv ASP Inc. OEA Initiator Facility

**Source Contact
Janet Bass
Phone: (435) 257-1005**

**Richard W. Sprott
Executive Secretary
Utah Air Quality Board**

Abstract

Autoliv ASP, Inc is requesting that the existing Approval Order (AO) be modified to correct the equipment specifications and equipment listing. Currently they have a boiler that is rated at 1.5×10^6 BTU/hr (MMBTU/hr) and is listed as 1.0 MMBTU/hr. This boiler is exempt from being listed under the UAC R307-413-4. They installed a new emergency generator that was listed in the AO as 200 Hp. Autoliv ASP has requested that it be changed from 200 Hp to the actual rating, which is 235 Hp. The natural gas limits and diesel fuel limits will not be increased. Therefore, there will be no increase in emissions from these corrections. This is a minor modification to an existing minor source. Box Elder County is an attainment area of the National Ambient Air Quality Standards (NAAQS) for all pollutants. New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations do not apply to this source. Title V does not apply to this source.

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an AO by the Executive Secretary of the Utah Air Quality Board.

A 10-day public comment period will be held in accordance with UAC R307-401-4. A notice of intent to approve will be published in the Box Elder News & Journal on October 15, 2003. During the public comment period the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing it will be held in accordance with UAC R307-401-4. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed AO conditions during this period and make any comments you may have. The proposed conditions of the AO may be changed as a result of the comments received. Unless changed, the AO will be based upon the following conditions:

General Conditions:

1. This AO applies to the following company:

Site Office

Autoliv ASP, Inc
OEA Inflator Facility
1360 North 1000 West
Tremonton, Utah 84337
Phone: (435) 257-1000
FAX: (435) 257-1010

The equipment listed in this AO shall be operated at the following location:

1360 North 1000 West, Tremonton, Box Elder County, Utah

Universal Transverse Mercator (UTM) Coordinate System: UTM Datum NAD27
4,620.6 kilometers Northing, 402.1 kilometers Easting; Zone 12

2. All definitions, terms, abbreviations, and references used in this AO conform to those used in the Utah Administrative Code (UAC) Rule 307 (R307) and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401-1.
5. All records referenced in this AO which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request, and the records shall include the two-year period prior to the date of the request. Records shall be kept a minimum period of two years.
6. Autoliv, ASP, Inc. shall conduct its operations of the Inflator Plant in accordance with the terms and conditions of this AO, which was written pursuant to Autoliv's Notice of Intent (NOI) submitted to the Division of Air Quality (DAQ) on June 19, 2003.
7. This AO shall replace the AO (DAQE-845-01) dated October 5, 2001.
8. The approved installations shall consist of the following equipment or equivalent*:

		Stack ID No.
A.	Natural Gas-Fired Boilers**	
1)	Boiler 1 1.03 x 10 ⁶ Btu/hr Boiler	Point Source B-P1
2)	Boiler 2 1.75 x 10 ⁶ Btu/hr Boiler	Point Source B-P2
3)	Boiler 3 0.56 x 10 ⁶ Btu/hr Boiler	Point Source B-P3
4)	Boiler 4 (water heater) 0.56 x 10 ⁶ Btu/hr Boiler	Point Source B-P4
5)	Boiler 5 (Explosives Drying) 1.5 x 10 ⁶ Btu/hr Boiler	Point Source B-P5
B.	Explosives Production	
1)	Explosives Preparation Hoods	Point Sources Z-P1a and Z-P1b
2)	Solvent Preparation Hood	Point Sources Z-P2a and Z-P2b
3)	Explosives Preparation Hood	Point Source Z-P3a and Z-P3b
4)	Solvent Preparation Hood	Point Source Z-P4a and Z-P4b
5)	Research & Development	Point Source Z-P1a and Z-P5b
C.	Fugitives	
1)	Explosives Production	Fugitive Source F1

- | | | |
|----|-------------------------|--------------------|
| 2) | Equipment Cleaning | Fugitive Source F2 |
| 3) | Machining | Fugitive Source F3 |
| 4) | Welding | Fugitive Source F4 |
| 5) | Injection Molding | Fugitive Source F5 |
| 6) | Non-Destructive Testing | Fugitive Source F6 |
| 7) | Destructive Testing | Fugitive Source F7 |

D. Diesel-fired emergency generator rated at 2220 hp, Cummins KTA50G9

E. Diesel-fired emergency generator rated at 235 Hp

F. Miscellaneous Equipment**

Miscellaneous equipment, including fork-lift trucks, parts washers, fume hoods, compressors, portable generators rated at less than 50 Hp, welders, dust-hogs, diesel fuel storage tanks less than 10,000 gallons, and other equipment, and operations associated with maintenance, research and development, quality control and quality assurance, material and product receipt-storage-shipment.

* Equivalency shall be determined by the Executive Secretary.

** This equipment is listed for informational purposes only.

Limitations and Tests Procedures

9. Visible emissions from the following emission points shall not exceed the following values:

- A. All explosives production hoods exhaust points - 5% opacity
- B. All natural gas combustion points - 10% opacity
- C. All diesel engines - 20% opacity
- D. All other points - 20% opacity

Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9.

10. The following consumption limits shall not be exceeded:

- A. 43.8×10^6 scf of natural gas for the entire plant per rolling 12-month period
- B. 12,875 gallons of diesel fuel for all emergency generators.

To determine compliance with a rolling 12-month total the owner/operator shall calculate a new 12-month total by the twentieth day of each month using data from the previous 12 months. Records of consumption shall be kept for all periods when the plant is in operation. Consumption shall be determined by the monthly billings. Consumption of diesel fuel for maintenance and power production shall be determined by supervisor monitoring and by maintaining of an operations log.

11. Emergency generators shall be used for electricity producing operation only during the periods when electric power from the public utilities is interrupted. Records documenting generator usage shall be kept in a log and they shall show the date the

generator was used, the duration in hours of the generator usage, and the reason for each generator usage.

Fuels

12. Autoliv ASP, Inc. shall use only natural gas as a fuel in the boilers and water heaters and diesel fuel as a fuel in the emergency generators.
13. The sulfur content of any fuel oil or diesel burned shall not exceed 0.5 percent by weight for diesel fuels consumed in all equipment.

The sulfur content shall be determined by ASTM Method D-4294-89 or approved equivalent. Certification of fuels shall be either by Autoliv ASP, Inc.'s own testing or test reports from the fuel marketer.

Volatile Organic Compound (VOC) and Hazardous Air Pollutants (HAPs) Limitations

14. The plant-wide emissions of VOCs and HAPs from the paint booths, degreasers, contact cement applicators, etc. and associated operations shall not exceed:

14.88 tons per rolling 12-month period for VOCs
 11.77 tons per rolling 12-month period for total HAPs
 9.97 tons per rolling 12-month period for Hexane
 1.80 tons per rolling 12-month period for Methanol

Compliance with each/the limitation shall be determined on a rolling 12-month total. Based on the twentieth day of each month, a new 12-month total shall be calculated using data from the previous 12 months.

The VOC and HAP emissions shall be determined by maintaining a record of VOC and HAP emitting materials used each month. The record shall include the following data for each material used:

Name of the VOC and HAPs emitting material, such as: paint, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.

- A. Name of the VOC and HAPs emitting material, such as: paint, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.
- B. Density of each material used (pounds per gallon)
- C. Percent by weight of all VOC and HAP in each material used
- D. Gallons of each VOC and HAP emitting material used
- E. The amount of VOC and HAP emitted monthly by each material used shall be calculated by the following procedure:

$$\text{VOC} = \frac{\% \text{ VOC by Weight}}{(100)} \times [\text{Density } (\frac{\text{lb}}{\text{gal}})] \times \text{Gal Consumed} \times \frac{1 \text{ ton}}{2000 \text{ lb}}$$

$$\text{HAP} = \frac{\% \text{ HAP by Weight}}{(100)} \times \frac{[\text{Density (lb)}]}{(\text{gal})} \times \text{Gal Consumed} \times \frac{1 \text{ ton}}{2000 \text{ lb}}$$

- F. The amount of VOC or HAP emitted monthly from all materials used.
- G. The amount of VOCs or HAPs reclaimed for the month shall be similarly quantified and subtracted from the quantities calculated above to provide the monthly total VOC or HAP emissions

Records & Miscellaneous

15. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded.
16. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

Under R307-150-1, the Executive Secretary may require a source to submit an emission inventory for any full or partial year on reasonable notice.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the Division of Air Quality (DAQ). The Utah Administrative Code R307 rules used by DAQ, the NOI guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

<http://www.airquality.utah.gov>

The annual emission estimations below include point source, and fugitive emissions and do not include fugitive dust, road dust, tail pipe emissions, and grandfathered emissions. These emissions are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, Maintenance area, and Title V source requirements of the R307. They are not to be used for determining compliance.

The Potential To Emit (PTE) emissions for this source (the entire plant, or specify what portion) are currently calculated at the following values:

	<u>Pollutant</u>	<u>lbs/yr</u>
A.	PM ₁₀	0.53
B.	SO ₂	0.27

C.	NO _x	6.10
D.	CO.....	1.43
E.	VOC.....	14.88
F.	HAPs	
	Hexane	9.97
	Methanol.....	1.80
	Total HAPs.....	11.77

The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Sincerely,

Rusty Ruby, Manager
New Source Review Section